

DICKINSON WRIGHT PLLC

Justin J. Bustos, Nevada Bar No. 10320
 Email: JBustos@dickinsonwright.com
 100 West Liberty Street, Suite 940
 Reno, Nevada 89501-1991
 Tel: (775) 343-7500
 Fax: (844) 670-6009

Gabriel A. Blumberg, Nevada Bar No. 12332

Email: GBlumberg@dickinsonwright.com
 3883 Howard Hughes Parkway, Suite 800
 Las Vegas, NV 89169
 Tel: (702) 550-4400
 Fax: (844) 670-6009

COOLEY LLP

Sarah Lightdale (pro hac vice)
 Kaitland Kennelly (pro hac vice)
 Amanda Liverzani (pro hac vice)
 Email: slightdale@cooley.com
 Email: kkennelly@cooley.com
 Email: aliverzani@cooley.com
 55 Hudson Yards
 New York, NY 10001
 Tel: (212) 479-6000
 Fax: (212) 479-6275

Alexandra Rex Mayhugh (pro hac vice)

Email: amayhugh@cooley.com
 Wells Fargo Center, South Tower
 355 South Grand Avenue, Suite 900
 Los Angeles, CA 90071
 Tel: (213) 561-3250
 Fax: (213) 561-3244

Attorneys for Plaintiff Mind Medicine (MindMed), Inc.

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

MIND MEDICINE (MINDMED) INC., a
 British Columbia Corporation,

Plaintiff,

v.

SCOTT FREEMAN, an individual and FCM
 MM HOLDINGS, LLC a Wyoming Limited
 Liability Company,

Defendants.

Case No. 2:23-cv-01354-RFB-MDC

**STIPULATION FOR TEMPORARY STAY
 OF CASE DEADLINES TO FACILITATE
 POTENTIAL SETTLEMENT**

(First Request)

1 Plaintiff Mind Medicine (MindMed) Inc. (“MindMed”) and Defendants Scott Freeman
2 (“Dr. Freeman”) and FCM MM Holdings, LLC (“FCM”) (collectively, the “Parties”), by and
3 through their respective counsel of record, stipulate and agree as follows:

4 1. MindMed and Dr. Freeman are currently conducting discovery in accordance with
5 the Discovery Plan and Scheduling Order (ECF No. 43) entered on October 13, 2023.

6 2. Discovery with respect to FCM is stayed in accordance with the Court’s February
7 14, 2024 Order (ECF No. 122).

8 3. On February 16, 2024, MindMed filed a Motion for Entry of Confidentiality and
9 Protective Order (ECF No. 123). On March 1, 2024, Dr. Freeman and FCM filed oppositions to
10 the Motion for Entry of Confidentiality and Protective Order (ECF Nos. 126, 127). MindMed’s
11 reply brief is currently due on March 18, 2024 (ECF No. 129).

12 4. The Parties have reached an agreement in principle to resolve this dispute and
13 another action pending in the Southern District of New York.

14 5. In order to allow the Parties to focus on finalizing a definitive settlement agreement,
15 they have agreed to a 21-day adjournment of all current case deadlines, including MindMed’s reply
16 in support of the Motion for Entry of Confidentiality and Protective Order.

17 6. In the event the Parties do not reach a final settlement, they will submit a proposed
18 amended scheduling order in accordance with LR 26-3

19 7. In accordance with this Stipulation, MindMed’s Reply brief in support of its Motion
20 for Entry of Confidentiality and Protective Order (ECF No. 123) will be due on April 8, 2024.

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

8. This is the first request for a temporary stay of all case deadlines. It is the second request for an extension of time for MindMed to file its Reply in support of its Motion for Entry of Confidentiality and Protective Order. This stipulation is made in good faith for the reasons outlined above and not for the purpose of delay.

DATED this 14th day of March, 2024.

DICKINSON WRIGHT PLLC

/s/ Justin J. Bustos

JUSTIN J. BUSTOS

Nevada Bar No. 10320

jbustos@dickinsonwright.com

100 W. Liberty Street, Suite 940

Reno, Nevada 89501

Tel.: (775) 343-7503

Fax: (844) 670-6009

Gabriel A. Blumberg, Nevada Bar No. 12332

Email: gblumberg@dickinson-wright.com

3883 Howard Hughes Parkway, Suite 800

Las Vegas, NV 89169

Tel: (702) 550-4400

Fax: (844) 670-6009

DATED this 14th day of March, 2024.

HOLLAND & HART LLP

/s/ Robert J. Cassity

ROBERT J. CASSITY

Nevada Bar No. 9779

ERICA C. MEDLEY

Nevada Bar No. 13959

9555 Hillwood Rive, 2nd Floor

Las Vegas, NV 89134

Tel: (702) 669-4600

Fax: (702) 669-4650

Email: bcassity@hollandhart.com

Email: ecmedley@hollandhart.com

DATED this 14th day of March, 2024.

LEWIS ROCA ROTHGERBER
CHRISTIE LLP

/s/ J. Christopher Jorgensen

DANIEL F. POLENSBERG

Nevada Bar No. 2376

DPolsenberg@LewisRoca.com

ABRAHAM G. SMITH

Nevada Bar No. 13250

ASmith@LewisRoca.com

J. CHRISTOPHER JORGENSEN

Nevada Bar No. 5382

CJorgensen@LewisRoca.com

3993 Howard Hughes Parkway, Ste 600

Las Vegas, NV 89169-5996

Tel: (702) 949-8200

Fax: (702) 49-8398

ORDER

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: 3-15-24